

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

CHEETAH OMNI LLC
Plaintiff,

vs.

ALCATEL-LUCENT USA, INC. ET AL.
Defendants.

Civil Action No. 6:11-cv-390

Judge Leonard Davis

Jury Demanded

TELLABS' IDENTIFICATION OF TRIAL WITNESSES

Pursuant to the Court's Docket Control Order (Dkt. No. 107), defendants Tellabs, Inc., Tellabs Operations, Inc., and Tellabs North America, Inc. (collectively "Tellabs") hereby submits the following lists of witnesses whom Tellabs expects to present at trial and those whom Tellabs may call if the need arises. Tellabs expressly reserves the right to call live, by video, or by deposition any witness on this list or any witness on Cheetah's witness list or any of the other Defendant's witness lists. Tellabs hereby expressly reserves the right to supplement, augment, or otherwise modify this list based on circumstances as they may evolve prior to the commencement of trial.

A. Witnesses Tellabs Expects To Present At Trial

Witness	Employer	Topic of Testimony	Live or By Deposition
Dan Kelly	Tellabs	Tellabs' corporate representative; Corporate history	Live
Yajun Wang	Tellabs	Non-infringing alternatives, including Nistica and Finisar	Live
Ken Rudofski	Tellabs	Laches and equitable estoppel; Tellabs' interaction with Dr. Islam and Cheetah	Live

Jack Kelly	CoAdna Photonics	Non-infringement; Technical information regarding CoAdna WSS	Live or by Video Deposition
Dr. Jung-Chih Chiao	The University of Texas at Arlington	Non-infringement; Non-infringing alternatives; Topics covered in expert reports	Live
Dr. Keith Goossen	The University of Delaware	Invalidity; Topics covered in expert report	Live
James Malackowski	Ocean Tomo	Damages; Non-infringing alternatives; Topics covered in expert report	Live
Muhammad Islam	Cheetah Omni, LLC	Laches and equitable estoppel; Patents-in-suit; Alleged invention; Interactions with Tellabs; Information on Cheetah Omni LLC	Live

B. Witnesses Tellabs May Call If The Need Arises

Witness	Employer	Topic of Testimony	Live or By Deposition
Mark Pashan	Tellabs	Alternative Tellabs' corporate representative; Alternative Corporate history	Live
Richard Younce	Tellabs	Laches and equitable estoppel; Tellabs' interaction with Dr. Islam and Cheetah	Live
Brian Nagle	Tellabs	Tellabs' licensing as related to Cheetah's claim for alleged damages	Live
Thomas Strasser	Nistica, Inc.	Non-infringing alternatives; information regarding the Nisitca WSS	Video deposition
Dr. Larry Fabiny	Finisar Corp.	Non-infringing alternatives; information regarding the Finisar WSS	Video Deposition

Fujitsu Network Communications corporate representative	Fujitsu Network Communications	Alleged damages	Video Deposition
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C. Witnesses Tellabs May, But Probably Will Not, Call

Tellabs may also call and/or cross-examine witnesses listed or called by Plaintiff, and Tellabs reserves the right to call such witnesses in putting on its affirmative case and/or to include evidence elicited from such witnesses on cross-examination as part of its affirmative case. In addition, Tellabs may, but probably will not, call the following witnesses:

Witness	Employer	Topic of Testimony	Live or By Deposition
Tim Toth	Tellabs	Damages	Live
Renato Cavour	Tellabs	Testing of Tellabs' ROADM modules	Live
Jim Harlan	Xtera Communications, Inc.	Laches and equitable estoppel; Dr. Islam's relationship and interaction with Xtera	Video deposition

Respectfully submitted,

Dated: September 19, 2013

/s/ Robert D. Leighton

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 19, 2013.

/s/ Robert D. Leighton